

Robin Russell
State Bar. No. 17424001
Michael D. Morfey
State Bar No. 24007704
David A. Zdunkewicz
State Bar No. 22253400
Ashley L. Harper
State Bar No. 24065272
HUNTON ANDREWS KURTH LLP
600 Travis, Suite 4200
Houston, Texas 77002
(713) 220-4200 - Telephone
(713) 220-4285 - Telecopy

COUNSEL TO HUNTON ANDREWS KURTH LLP

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	Chapter 11
RINCON ISLAND LIMITED	§	
PARTNERSHIP,	§	Case No. 16-33174-hdh-7
	§	
Debtor.	§	

HUNTON ANDREWS KURTH LLP,	§	
	§	
Plaintiff,	§	
	§	Adversary No. 18-03053-hdh
v.	§	
	§	
HVI CAT CANYON, INC., AND	§	
RILP-H, LLC.	§	
	§	
Defendants.	§	

AGREED MOTION TO ABATE ADVERSARY PROCEEDING

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 1100 COMMERCE ST., RM. 1254, DALLAS, TX 75242-1496 BEFORE CLOSE OF BUSINESS ON JULY 2, 2018, WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY

PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

TO THE HONORABLE HARLIN D. HALE, UNITED STATES BANKRUPTCY JUDGE:

Plaintiff Hunton Andrews Kurth LLP ("HuntonAK") and Defendants HVI Cat Canyon, Inc. ("HVI") and RILP-H, LLC ("RILP-H", and together with HVI, the "Defendants") (HuntonAK and the Defendants, together, the "Parties") file this Agreed Motion to Abate Adversary Proceeding (the "Motion"), and in support respectfully show as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over the subject matter of this Motion pursuant to 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

RELIEF REQUESTED

2. This Motion is filed by agreement of the Parties to this adversary proceeding.
3. The Parties have entered into a confidential settlement agreement to resolve all issues in this adversary proceeding. The terms of the settlement agreement must be satisfied by October 1, 2019, approximately eighteen (18) months from the date of this Motion.
4. To allow the Parties sufficient time to satisfy the terms of the settlement agreement, the Parties agree that abating this adversary proceeding is the most efficient and practical means of conserving resources in the interim.

WHEREFORE, the Parties request that the Court (i) abate the above-styled adversary proceeding, (ii) hold a status conference on a date to be determined in October 2019 upon

request of the Parties, and (iii) grant such other and further relief as it may show itself to be justly entitled.

Dated: June 11, 2018

Respectfully submitted,

By: /s/ David A. Zdunkewicz

Robin Russell

State Bar. No. 17424001

Michael D. Morfey

State Bar No. 24007704

David A. Zdunkewicz

State Bar No. 22253400

Ashley L. Harper

State Bar No. 24065272

Hunton Andrews Kurth LLP

600 Travis, Suite 4200

Houston, Texas 77002

Tel: (713) 220-4128

Fax: (713) 220-4285

ATTORNEYS FOR HUNTON ANDREWS
KURTH LLP

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2018, a true and correct copy of the foregoing Motion was served via e-mail on parties receiving Electronic Case Notifications in this proceeding.

/s/ David A. Zdunkewicz

David A. Zdunkewicz